



Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit

REVIEW REPORT

Oregon Rubber Co./Oregon Tread Rubber Co./Wyatt's Tire Co.
3595 West 1st Avenue
Eugene, Oregon, 97402

Permit No. 206127

Source Information:

Primary SIC	7534
Secondary SIC	--
Primary NAICS	326212
Secondary NAICS	--

Source Categories (LRAPA title 37, Table 1)	B.71: Tire Manufacturing
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	N
Emission Credits	N
Special Conditions	N
Compliance Schedule	N

Source Test [date(s)]	N
COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	February 15
Semi-annual Report (due date)	N
SACC (due date)	N
GHG Report (due date)	N

Quarterly Report (due date)	N
Monthly Report (due dates)	N
Excess Emissions Report	Y
Other Reports (due date)	N

Air Programs

NSPS (list subparts)	N
NESHAP (list subparts)	N
40 CFR part 64 Compliance Assurance Monitoring (CAM)	N
Regional Haze (RH)	N
40 CFR part 68 Risk Management	N
Cleaner Air Oregon (CAO)	N
Synthetic Minor (SM)	N
SM-80	N

Title V	N
Major HAP Source	N
Federal Major Source	N
TACT	N
Type A State New Source Review	N
Type B State New Source Review	N
Prevention of Significant Deterioration (PSD)	N
Nonattainment New Source Review (NNSR)	N

Permit Identification

1. Oregon Rubber Co./Oregon Tread Rubber Co./Wyatt's Tire Co. ('the facility' or 'ORC') operates a tire treading and manufacturing operation primarily located at 3595 West 1st Avenue in Eugene, Oregon. The facility began operating in 1976.
2. The facility operates under the primary Standard Industrial Classification (SIC) code of 7534 – Tire Retreading and Repair Shops. The primary North American Industry Classification System (NAICS) code is 326212 – Tire Retreading.

General Background

3. The facility primarily operates a tire tread manufacturing operation at 3595 West 1st Avenue and shares 68 Wallis Street with Wyatt's Tire Company manufacturing retreaded tires in Eugene, Oregon.
4. At the 3595 West 1st Avenue location, styrene-butadiene rubber (SBR), natural rubber, oil, and additives are compounded in batches and mixed in a Banbury mill, conveyed to a rubber mill, and then into an extruder. The extruded rubber slab is placed into a heated mold to produce vulcanized rubber tire treads. Major activities include rubber mixing and milling, rubber extrusion, and rubber tread press.
5. At the 68 Wallis Street location, the tire treads are glued to tire cores that have been buffed and prepared for re-treading/recapping. The finished product is cured in an autoclave to assure bonding of the tread to the tire core surface. Tire retread activities tread buffing, rubber cement glue applicator, tire buffing, tire curing and tire autoclave. The facility also paints a portion of the tire with latex paint. This activity was deemed to have no significant emissions to the atmosphere.
6. The facility uses a baghouse installed in 2012 to control particulate matter emissions from rubber mixing and milling and milling activities (EU-1). The facility uses a cyclone followed by a SmogHog ESP Double Pass electrostatic precipitator manufactured by United Air Specialists, Inc., to control particulate matter emissions from tread buffing activities (EU-4). The SmogHog was installed in 2016. The facility uses a water spray followed by a cyclone to control particulate matter emissions from tire buffing activities (EU-7). The cyclone was installed prior to 1976. The water spray is controlled by a programmable logic controller that increases the water flow depending on preset variables.
7. The 3595 West 1st Avenue facility has a natural gas-fired boiler (CIA-1) with a maximum heat input of 1.725 MMBtu per hour. This emissions unit is considered a categorically insignificant activity. Although categorically insignificant activities must comply with all applicable requirements, a Simple ACDP is required to contain only relevant requirements. As such, the draft permit will not contain any specific requirements for this emissions unit.

Reasons for Permit Action

8. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which was issued on February 15, 2019, and was originally scheduled to expire on February 15, 2024. As the facility submitted a timely renewal application on October 16, 2023, the current permit will remain in effect until final action has been taken on the renewal application. The renewed Simple ACDP will be valid for up to ten (10) years.

Attainment Status

9. The facility is located in an area that has been designated as attainment or unclassified for all criteria pollutants. The facility is located inside the Eugene-Springfield UGB as defined in LRAPA 29-0010 which designates the Eugene-Springfield CO and PM₁₀ maintenance areas. The facility is located inside the Eugene-Springfield UGB as described in the current Eugene-Springfield Metropolitan Area General Plan, as amended. The facility is located within 100 kilometers of three (3) Class I air quality protection areas: Diamond Peak Wilderness, Mount Washington Wilderness and Three Sisters Wilderness area.

Permitting History

10. LRAPA has reviewed and issued the following permitting actions to this facility:

Date(s) Approved/Valid	Permit Action Type	Description
11/13/2012 – 11/13/2017	Simple ACDP	Initial permitting
02/15/2019 – 02/15/2024	Simple ACDP	Renewal
Upon Issuance	Simple ACDP	Renewal

Emissions Unit Descriptions

11. The significant emissions units regulated by the draft permit are the following:

Emissions Unit ID	Description	Pollution Control Device	Installed / Last Modified
EU-1	Rubber Mixing & Milling (3595 W. 1 st Ave.)	Baghouse	1976
EU-2	Rubber Extrusion (3595 W. 1 st Ave.)	None	1976
EU-3	Rubber Tread Press (3595 W. 1 st Ave.)	None	1976 (2), 1983 (8), 1997 (2)
EU-4	Tread Buffing (68 Wallis St.)	Cyclone / SmogHog ESP	1976
EU-5	Rubber Cement Glue Applicator (68 Wallis St.)	None	1976
EU-7	Wyatt's Tire Buffing (68 Wallis St.)	Water Spray with Cyclone	2016
EU-8	Wyatt's Tire Curing (68 Wallis St.)	None	1976
EU-9	Wyatt's Tire Autoclave (68 Wallis St.)	None	1976

Nuisance, Deposition and Other Emission Limitations

12. Under LRAPA 49-010(1), the permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.
13. Under LRAPA 32-055, the permittee must not cause or permit the emission of particulate matter which is larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.
14. Under LRAPA 32-090(1), the permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination is to be made by LRAPA. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.

General Emission Limitations

Conditions Specific to Emissions Unit EU-1 – Rubber Mixing & Milling

15. EU-1 is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity. Compliance demonstration is based on a

quarterly visible emissions survey performed on any emission points for this process while operating.

16. EU-1 was installed or last modified in 1976. This emissions unit is subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015, the particulate matter emission limit is 0.14 grains per dry standard cubic foot if there are no representative compliance test results. Compliance demonstration is based on the use of a baghouse to control particulate matter emissions and the preparation and use of an Operation & Maintenance Plan.
17. EU-1 is subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials. Compliance demonstration is based on the use of a baghouse to control particulate matter emissions and the preparation and use of an Operation & Maintenance Plan.

Conditions Specific to Emissions Unit EU-2 – Rubber Extrusion

18. EU-2 is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity. Compliance demonstration is based on a quarterly visible emissions survey performed on any emission points for this process while operating.
19. EU-2 was installed or last modified in 1976. This emissions unit is subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015, the particulate matter emission limit is 0.14 grains per dry standard cubic foot if there are no representative compliance test results. Compliance demonstration is based on a quarterly visible emissions survey performed on any emission points for this process while operating.
20. EU-2 is subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials. Compliance demonstration is based on a quarterly visible emissions survey performed on any emission points for this process while operating.

Conditions Specific to Emissions Unit EU-3 – Rubber Tread Press, EU-5 – Rubber Cement Glue Applicator, EU-8 – Wyatt's Tire Curing, and EU-9 – Wyatt's Tire Autoclave

21. These emissions units emit only VOC, are uncontrolled, and not subject to any specific TACT requirements. As such, there are no specific conditions for these emissions units other than the requirements for calculating emissions and determining compliance with the PSEL limitations, as applicable.

Conditions Specific to Emissions Unit EU-4 – Tread Buffing

22. EU-4 is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity. Compliance demonstration is based on a quarterly visible emissions survey performed on any emission points for this process while

operating.

23. EU-4 was installed or last modified in 1976. This emissions unit is subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015, the particulate matter emission limit is 0.14 grains per dry standard cubic foot if there are no representative compliance test results. Compliance demonstration is based on the use of a cyclone followed by a SmogHog ESP to control particulate matter emissions and the preparation and use of an Operation & Maintenance Plan.
24. EU-4 is subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials. Compliance demonstration is based on the use of a cyclone followed by a SmogHog ESP to control particulate matter emissions and the preparation and use of an Operation & Maintenance Plan.

Conditions Specific to Emissions Unit EU-7 – Wyatt's Tire Buffing

25. EU-7 is subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity. Compliance demonstration is based on a quarterly visible emissions survey performed on any emission points for this process while operating.
26. EU-7 was installed or last modified in 2016. This emissions unit is subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015, the particulate matter emission limit is 0.14 grains per dry standard cubic foot if there are no representative compliance test results. Compliance demonstration is based on the use of a water spray followed by a cyclone to control particulate matter emissions and the preparation and use of an Operation & Maintenance Plan.
27. EU-7 is subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials. Compliance demonstration is based on the use of a water spray followed by a cyclone to control particulate matter emissions and the preparation and use of an Operation & Maintenance Plan.

Typically Achievable Control Technology (TACT)

28. LRAPA 32-008(1) requires an emissions units installed and last modified before January 1, 1994 to meet TACT if the emissions unit meets the following criteria: The emissions unit is not already subject to emission standards for the regulated pollutant under LRAPA title 30, title 32, title 33, title 38, title 39 or title 46 at the time TACT is required; the source is required to have a permit; the emissions unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; and LRAPA determines that air pollution control devices and emission reduction processes in use for the emissions do not represent TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare or the environment.

- 28.a. Emissions units EU-1, EU-2, ten (10) of the twelve EU-3 processes, EU-4, EU-8 and EU-9 are not subject to TACT because the potential emissions from these emissions units will not exceed the existing unit emission thresholds of five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant.
 - 28.b. EU-5 has potential emissions of VOC greater than the existing unit TACT thresholds. While LRAPA has not performed a formal TACT determination for VOC from this emissions unit, LRAPA believes that current operating practices will likely meet the TACT requirements because add-on control devices would likely to be economically infeasible.
29. LRAPA 32-008(2) requires new units installed or existing emissions units modified on or after January 1, 1994, meet TACT if the emissions unit meets the following criteria: The emissions unit is not subject to Major NSR in title 38, Type A State NSR in LRAPA title 38, an applicable Standard of Performance for New Stationary Sources in title 46, or any other standard applicable only to new or modified sources in title 32, title 33, or title 39 for the regulated pollutant emitted; the source is required to have a permit; if new, the emissions unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emissions unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.
- 29.a. The two (2) EU-3 processes that are considered new units and emissions unit EU-7 are not subject to TACT because the potential emissions from each of these processes will not exceed the emission threshold of one (1) ton per year of any criteria pollutant.

New Source Performance Standards (NSPS)

- 30. 40 CFR part 60, subpart BBB – Standards of Performance for the Rubber Tire Manufacturing Industry is not applicable to this facility because this facility is not considered by US EPA to be a “rubber tire manufacturing plant” and does not produce tires. See the US EPA Applicability Determination Index, Control 0500031.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- 31. 40 CFR part 63, subpart XXXX – National Emission Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing is not applicable to this facility because the facility is not primarily engaged in the operations listed in 40 CFR 63.5981(a) and this facility is not a major source of federal HAPs.
- 32. 40 CFR part 63, subpart JJJJJJ – National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources is not applicable to the boiler (EU-6) because the boiler is gas-fired as defined by 40 CFR 63.11195(e).

Plant Site Emission Limits (PSELs)

- 33. Provided below is a summary of the baseline emission rate, netting basis and PSELs for this facility.

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PTE (TPY)	Significant Emission Rate (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)		
PM	NA	0	0	24	De Minimis	0.55	25
PM ₁₀	NA	0	0	14	De Minimis	0.55	15
PM _{2.5}	NA	0	0	9	De Minimis	0.55	10
CO	NA	0	0	99	De Minimis	0.62	100
NO _x	NA	0	0	39	De Minimis	0.74	40

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PTE (TPY)	Significant Emission Rate (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)		
SO ₂	NA	0	0	39	De Minimis	1.3E-02	40
VOC	NA	0	0	39	39	50	40
GHG (CO _{2e})	NA	0	0	74000	De Minimis	885	75,000

- 33.a. While the facility began operation prior to the baseline years of 1977 or 1978, LRAPA does not have any information to establish a baseline emission rate for this facility. A baseline emission rate is not established for PM_{2.5} in accordance with LRAPA 42-0048(3). The facility has no baseline emission rate for GHGs because the facility did not request a baseline emission rate for this pollutant.
- 33.b. The netting basis for all pollutants is 0 (zero) in accordance with LRAPA 42-0046(4).
- 33.c. In accordance with LRAPA 42-0041(2), the PSELs are set equal to the sources potential-to-emit (PTE) for a given regulated pollutant. The previous PSELs for this facility were set at a Generic PSEL as allowed under previous regulations that have been revised. No PSELs are set for CO, NO_x, SO₂ and GHGs in accordance with LRAPA 42-0020(3)(a) because these pollutants are emitted below the de minimis as defined in LRAPA title 12.

Unassigned Emissions and Emission Reduction Credits

34. The facility has zero (0) unassigned emissions. Unassigned emissions are equal to the netting basis minus the source's current PTE, minus any banked emission reduction credits. The facility has zero (0) tons of emission reduction credits.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

35. This source is located in an area that is designated attainment or unclassified for all regulated pollutants. For pollutants other than CO and PM₁₀, the proposed PSELs are less than the federal major source threshold for non-listed sources of 250 TPY per regulated pollutant and are not subject to Major NSR. For CO and PM₁₀, the source is located in a maintenance area. The proposed PSELs for CO and PM₁₀ are less than the 100 TPY threshold that determines the applicability of Major NSR in a maintenance area.

Federal Hazardous Air Pollutants/Toxic Air Contaminants

36. Potential annual federal hazardous air pollutant emissions (HAP) are based on the potential to emit of the facility operating under permit limitations. The maximum potential emission of a single federal HAP is 4.9 tons per year (carbon disulfide). The maximum potential of the total of all federal HAP emissions is 8.0 tons per year. A major source of HAPs is defined as having potential HAP emissions of at least 10 tons per year of any single HAP and 25 tons per year of the aggregate of all HAPs. This facility does not have potential HAP emissions exceeding these thresholds and is considered a minor or area source of HAPs.
37. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and, therefore, is not yet required to perform a risk assessment or report annual emissions of toxic air contaminants. LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants (TAC) that have Risk Based Concentrations established in rule. All HAPs are on the list of approximately 600 TACs. The HAPs and TACs listed below are based upon safety data sheets and standard emission factors for the types of emissions units at this facility. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their TACs. Until then, this source will be required to report TAC emissions triennially.

38. The table below represents the potential emissions of federal HAPs and CAO TACs from this facility assuming operation at the permit allowable limitations, including emissions from categorically insignificant activities:

CAS/DEQ Number	Pollutant	PTE (TPY)	Federal HAP	CAO TAC
71-55-6	1,1,1-Trichloroethane	2.4E-02	Yes	Yes
79-34-5	1,1,2,2-Tetrachloroethane	5.2E-11	Yes	Yes
75-34-3	1,1-Dichloroethane	4.0E-11	Yes	Yes
75-35-4	1,1-Dichloroethene	2.9E-10	Yes	Yes
120-82-1	1,2,4-Trichlorobenzene	1.3E-12	Yes	Yes
96-12-8	1,2-Dibromo-3-Chloropropane	1.0E-10	Yes	Yes
106-99-0	1,3-Butadiene	1.2E-01	Yes	Yes
106-37-6	1,4-Dichlorobenzene	6.9E-04	Yes	Yes
78-93-3	2-Butanone	5.2E-02	No	Yes
126-99-8	2-Chloro-1,3-Butadiene	3.4E-02	Yes	Yes
532-27-4	2-Chloroacetophenone	1.5E-05	Yes	Yes
95-48-7	2-Methylphenol	5.5E-05	Yes	Yes
108-10-1	4-Methyl-2-Pentanone	3.1E-01	Yes	Yes
92-93-3	4-Nitrobiphenyl	1.6E-04	Yes	Yes
75-07-0	Acetaldehyde	6.4E-03	Yes	Yes
75-05-8	Acetonitrile	1.9E-03	Yes	Yes
98-86-2	Acetophenone	5.2E-02	Yes	Yes
107-02-8	Acrolein	5.5E-03	Yes	Yes
7664-41-7	Ammonia	4.3E-05	No	Yes
62-53-3	Aniline	1.8E-01	Yes	Yes
7440-38-2	Arsenic and compounds	8.8E-09	Yes	Yes
7440-39-3	Barium and compounds	5.1E-05	No	Yes
71-43-2	Benzene	2.3E-02	Yes	Yes
50-32-8	Benzo[a]pyrene	3.4E-05	Yes	Yes
100-44-7	Benzyl Chloride	2.2E-11	Yes	Yes
7440-41-7	Beryllium and compounds	2.2E-06	Yes	Yes
92-52-4	Biphenyl	3.3E-04	Yes	Yes
117-81-7	bis(2-Ethylhexyl)phthalate	4.7E-02	Yes	Yes
74-83-9	Bromomethane	4.6E-11	Yes	Yes
7440-43-9	Cadmium (Cd) Compounds	3.8E-04	Yes	Yes
75-15-0	Carbon Disulfide	4.9E+00	Yes	Yes
463-58-1	Carbonyl Sulfide	3.4E-01	Yes	Yes
67-66-3	Chloroform	1.1E-11	Yes	Yes
74-87-3	Chloromethane	3.5E-03	Yes	Yes
18540-29-9	Chromium (Cr) Compounds	6.1E-03	Yes	Yes
7440-48-4	Cobalt (Co) Compounds	2.4E-04	Yes	Yes
7440-50-8	Copper and compounds	2.4E-02	Yes	Yes
98-82-8	Cumene	2.5E-03	Yes	Yes
84-74-2	Di-n-butylphthalate	2.2E-02	Yes	Yes
132-64-9	Dibenzofuran	5.7E-04	Yes	Yes
131-11-3	Dimethylphthalate	7.3E-04	Yes	Yes
100-41-4	Ethylbenzene	2.7E-02	Yes	Yes
50-00-0	Formaldehyde	3.2E-05	Yes	Yes

CAS/DEQ Number	Pollutant	PTE (TPY)	Federal HAP	CAO TAC
110-54-3	Hexane	1.6E-01	Yes	Yes
540-84-1	Isooctane	5.5E-02	Yes	Yes
78-59-1	Isophorone	5.9E-03	Yes	Yes
7439-92-1	Lead (Pb) Compounds	6.5E-03	Yes	Yes
1330-20-7	m-Xylene + p-Xylene	4.1E-02	Yes	Yes
7439-96-5	Manganese and compounds	1.0E-05	Yes	Yes
75-09-2	Methylene Chloride	1.7E-01	Yes	Yes
7439-97-6	Mercury and compounds	6.2E-07	Yes	Yes
1313-27-5	Molybdenum trioxide	6.3E-06	No	Yes
91-20-3	Naphthalene	8.1E-03	Yes	Yes
7440-02-0	Nickel (Ni) Compounds	4.5E-03	Yes	Yes
95-53-4	o-Toluidine	2.0E-02	Yes	Yes
1330-20-7	o-Xylene	1.9E-02	Yes	Yes
401	PAHs	1.9E-06	Yes	Yes
108-95-2	Phenol	1.3E-02	Yes	Yes
75-56-9	Propylene Oxide	9.5E-01	Yes	Yes
7782-49-2	Selenium and compounds	1.2E-05	Yes	Yes
100-42-5	Styrene	5.2E-02	Yes	Yes
1634-04-4	t-Butyl Methyl Ether	2.9E-03	Yes	Yes
127-18-4	Tetrachloroethene	9.5E-02	Yes	Yes
108-88-3	Toluene	2.3E-01	Yes	Yes
79-01-6	Trichloroethene	8.2E-04	Yes	Yes
7440-62-2	Vanadium (fume or dust)	1.8E-07	No	Yes
1330-20-7	Xylene	1.7E-05	Yes	Yes
7440-66-6	Zinc and compounds	2.1E-04	No	Yes
Total HAPs and TACs (TPY) =			8.0	8.0

Toxic Release Inventory

39. The Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:

- Cancer or other chronic human health effects;
- Significant adverse acute human health effects; or
- Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI Program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

In 2023, this facility reported off-site disposal of 17 pounds of zinc compounds (CAS Number N982).

Compliance History

40. As a Simple ACDP, this facility is typically inspected by LRAPA at least once every ten (10) years. LRAPA has not yet conducted a Full Compliance Evaluation of this facility.
41. LRAPA has not taken any enforcement action against this facility since the last Simple ACDP renewal was issued on February 15, 2019.

Source Testing History

42. The facility is not required to conduct source testing at this time. LRAPA is not aware of any historical source testing conducted at this facility.

Recordkeeping Requirements

43. The facility is required to keep and maintain a record of the following information for a period of at least five (5) years.

Activity	Units	Minimum Recording Frequency
PSEL Recordkeeping		
Facility-wide 12-month rolling PSEL for each regulated pollutant	TPY	Monthly
Total rubber processed (for mixing, milling, extrusion, and tread press)	Lbs	Monthly
Tread buffing	Lbs	Monthly
Total rubber cement glue usage	Gallons	Monthly
Total tire production (for tire buffing, tire curing, and autoclave)	Tires	Monthly
General Recordkeeping		
Visible emission survey	--	Quarterly
Operation and Maintenance Plan	NA	Current version
Complaints from the public	--	Upon receipt
Excess emissions log of all planned and unplanned excess emissions	--	Per occurrence

Reporting Requirements

44. The facility must submit to LRAPA the following reports by no later than the dates indicated in the table below.

Report	Reporting Period	Due Date
PSEL pollutant emissions as calculated according to Condition 5 of the proposed permit, including supporting calculations. The summary must include emission calculations corresponding to each 12-month consecutive period in the previous calendar year.	Annual	February 15
A summary of all complaints received by the permittee and their resolution as required by Condition G11 of the proposed permit.	Annual	February 15
The excess emissions log required by Condition G16 of the proposed permit, if any planned or unplanned excess emissions have occurred during the reporting period.	Annual	February 15

Public Notice

45. Pursuant to paragraph 37-0064(5)(a), issuance of a renewed Simple Air Contaminant Discharge Permit requires a Category III public notice according to title 31. In accordance with paragraph

31-0030(3)(c), LRAPA provided public notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments.

The proposed permit was on public notice from February 20, 2025 to March 28, 2025. One (1) written comment was received during the public comment period. No public hearing was requested during the public comment period. After the comment period, LRAPA reviewed the comment but did not make any changes to the permit.

Public Comments Summary and LRAPA Responses

[All public comments that were received for this action are a public record and are retained with the public permit review files. Public comments that are not related to the review report or proposed permit, such as those comments that are statements of fact or express an opinion, are not presented in this document, and do not require a response from LRAPA.]

Comment 1: The commenter requested that LRAPA not allow the facility to further pollute Eugene, Oregon air quality.

Response 1: LRAPA appreciates the commenter's concern for good air quality. However, LRAPA is obligated to issue air permits to facilities that meet all applicable air regulations. This facility has operations that qualify for a Simple ACDP and is required to meet all applicable requirements that are contained in the Simple ACDP. LRAPA is unable to deny the permit to the facility and has not made any changes to the permit because of this comment.

Public Hearing Comment Receipt Log

Written comments were received from: Elizabeth Cable, cablesings@gmail.com

Oregon Rubber Company
 Permit No. 206127
 PSEL

Emission Unit	PM (TPY)	PM10 (TPY)	PM2.5 (TPY)	CO (TPY)	NOx (TPY)	SO2 (TPY)	VOC (TPY)*	GHG (TPY)	Single HAP (TPY)	Total HAP (TPY)
EU-1 - Rubber Milling and Mixing	3.6E-03	3.6E-03	3.6E-03				0.35			
EU-2 - Rubber Extrusion	6.9E-05	6.9E-05	6.9E-05				0.11			
EU-3 - Rubber Tread Press							3.58			
EU-4 - Tread Buffing	0.23	0.23	0.23				6.65			
EU-5 - Rubber Cement Glue Applicator							39.1			
EU-7 - Wyatt's Tire Buffing	0.30	0.30	0.30				0.07			
EU-8 - Wyatt's Tire Curing							0.09			
EU-9 - Wyatt's Tire Autoclave							0.04			
Total =	de minimis	de minimis	de minimis	de minimis	de minimis	de minimis	39	de minimis	4.9	8.0
CIA-1 - 1.725 MMBtu/hr Nat. Gas Boiler	1.8E-02	1.8E-02	1.8E-02	0.62	0.74	1.3E-02	4.1E-02	885		

Notes:

*The facility maximum PTE is 50 TPY. The facility has not requested their existing VOC PSEL of 39 TPY be raised.

Oregon Rubber Company Permit No. 206127 Federal HAPs/CAO TACs											
Pollutant	CAS/DEQ #	EU-1 - Rubber Milling and Mixing (lbs/yr)	EU-2 - Rubber Extrusion (lbs/yr)	EU-3 - Rubber Tread Press (lbs/yr)	EU-4 - Tread Buffing (lbs/yr)	CIA-1 - 1.725 MMBtu/hr Nat. Gas Boiler (lbs/yr)	EU-8 - Wyatt's Tire Curing (lbs/yr)	EU-9 - Wyatt's Tire Autoclave (lbs/yr)	Total (TPY)	HAP	TAC
1,1,1-Trichloroethane	71-55-6	1.42E+00	1.66E+00	4.46E+01	2.99E-01		2.41E-07		2.4E-02	Yes	Yes
1,1,2,2-Tetrachloroethane	79-34-5						1.03E-07		5.2E-11	Yes	Yes
1,1-Dichloroethane	75-34-3						7.96E-08		4.0E-11	Yes	Yes
1,1-Dichloroethene	75-35-4						5.85E-07		2.9E-10	Yes	Yes
1,2,4-Trichlorobenzene	120-82-1						2.59E-09		1.3E-12	Yes	Yes
1,2-Dibromo-3-Chloropropane	96-12-8						2.06E-07		1.0E-10	Yes	Yes
1,3-Butadiene	106-99-0		8.96E+00	2.13E+02	2.21E+01			3.18E-01	1.2E-01	Yes	Yes
1,4-Dichlorobenzene	106-37-6	2.16E-02		1.35E+00	5.66E-03		6.79E-07	4.10E-03	6.9E-04	Yes	Yes
2-Butanone	78-93-3	2.82E+01	2.07E+00	4.90E+01	2.49E+01		1.55E-06	2.08E-02	5.2E-02	No	Yes
2-Chloro-1,3-Butadiene	126-99-8				6.83E+01				3.4E-02	Yes	Yes
2-Chloroacetophenone	532-27-4		2.98E-02				1.28E-09		1.5E-05	Yes	Yes
2-Methylphenol	95-48-7	1.06E-01			3.27E-03		9.00E-09		5.5E-05	Yes	Yes
4-Methyl-2-Pentanone	108-10-1	5.42E+02	4.71E+01		1.60E+01		1.32E-05	8.09E+00	3.1E-01	Yes	Yes
4-Nitrobiphenyl	92-93-3				3.18E-01				1.6E-04	Yes	Yes
Acetaldehyde	75-07-0				1.28E+01	4.57E-02			6.4E-03	Yes	Yes
Acetonitrile	75-05-8		3.88E+00						1.9E-03	Yes	Yes
Acetophenone	98-86-2	1.36E+00	5.88E+01	2.45E+01	1.48E+01		1.20E-07	3.63E+00	5.2E-02	Yes	Yes
Acrolein	107-02-8		5.49E+00		5.39E+00	3.98E-02	1.28E-07		5.5E-03	Yes	Yes
Ammonia	7664-41-7					8.54E-02			4.3E-05	No	Yes
Aniline	62-53-3	8.51E+00	3.88E+00	7.37E+00	3.39E+02		4.36E-06	4.39E+00	1.8E-01	Yes	Yes
Arsenic and compounds	7440-38-2					1.77E-05			8.8E-09	Yes	Yes
Barium and compounds	7440-39-3					1.02E-01			5.1E-05	No	Yes
Benzene	71-43-2	8.18E-01	4.78E+00	2.41E+01	1.11E+01	1.81E-01	4.78E-07	5.12E+00	2.3E-02	Yes	Yes
Benzo[a]pyrene	50-32-8					6.77E-02			3.4E-05	Yes	Yes
Benzyl Chloride	100-44-7						4.42E-08		2.2E-11	Yes	Yes
Beryllium and compounds	7440-41-7					4.42E-03			2.2E-06	Yes	Yes
Biphenyl	92-52-4	2.08E-01	2.98E-01		5.55E-03		6.78E-08	1.58E-01	3.3E-04	Yes	Yes
bis(2-Ethylhexyl)phthalate	117-81-7	3.16E+00	2.01E+00	4.39E+01	4.43E+01		5.92E-07	5.78E-01	4.7E-02	Yes	Yes
Bromomethane	74-83-9						9.15E-08		4.6E-11	Yes	Yes
Cadmium (Cd) Compounds	7440-43-9	4.24E-02			7.18E-01	1.47E-03			3.8E-04	Yes	Yes
Carbon Disulfide	75-15-0	6.78E+01	4.70E+00	9.47E+03	2.53E+02		1.32E-05	3.29E-01	4.9E+00	Yes	Yes
Carbonyl Sulfide	463-58-1	2.82E+01		6.46E+02	7.28E+00		5.44E-07	4.82E-01	3.4E-01	Yes	Yes
Chloroform	67-66-3						2.17E-08		1.1E-11	Yes	Yes
Chloromethane	74-87-3	5.76E+00	1.18E+00		5.96E-03		9.25E-08	4.05E-02	3.5E-03	Yes	Yes
Chromium (Cr) Compounds	18540-29-9	1.24E-01	3.99E-01		1.12E+01	3.90E-01			6.1E-03	Yes	Yes
Cobalt (Co) Compounds	7440-48-4		1.76E-01		7.31E-03	2.90E-01			2.4E-04	Yes	Yes
Copper and compounds	7440-50-8					4.71E+01			2.4E-02	Yes	Yes
Cumene	98-82-8	2.14E-01	2.40E+00	1.05E+00	9.49E-01		4.75E-07	4.73E-01	2.5E-03	Yes	Yes
Di-n-butylphthalate	84-74-2	2.85E-01	3.51E+00	3.74E+01	2.77E+00		9.49E-07	1.28E-02	2.2E-02	Yes	Yes
Dibenzofuran	132-64-9	5.85E-02	5.73E-02	8.92E-01	1.33E-01		9.81E-09	6.08E-03	5.7E-04	Yes	Yes
Dimethylphthalate	131-11-3		7.57E-02	1.38E+00			9.60E-08		7.3E-04	Yes	Yes
Ethylbenzene	100-41-4	4.30E+00	1.43E+00		4.77E+01	2.95E-03	1.35E-05	1.34E+00	2.7E-02	Yes	Yes
Formaldehyde	50-00-0					6.48E-02			3.2E-05	Yes	Yes
Hexane	110-54-3	2.63E+01	6.98E+00	1.83E+02	1.03E+02	1.77E-04	5.97E-06	4.68E-01	1.6E-01	Yes	Yes
Isocotane	540-84-1	1.36E+01	7.99E-01		9.60E+01			1.19E-01	5.5E-02	Yes	Yes
Isophorone	78-59-1	1.17E+01			5.40E-03		2.06E-08		5.9E-03	Yes	Yes
Lead (Pb) Compounds	7439-92-1	5.74E-03			1.30E+01	1.62E-02			6.5E-03	Yes	Yes
m-Xylene + p-Xylene	1330-20-7	1.10E+01	5.89E+00	3.38E+01	2.66E+01		3.36E-05	4.10E+00	4.1E-02	Yes	Yes
Manganese and compounds	7439-96-5					2.06E-02			1.0E-05	Yes	Yes
Methylene Chloride	75-09-2	4.41E+01	2.33E+02	2.79E+01	4.16E+01		5.62E-06	8.94E-01	1.7E-01	Yes	Yes
Mercury and compounds	7439-97-6					1.24E-03			6.2E-07	Yes	Yes
Molybdenum trioxide	1313-27-5					1.25E-02			6.3E-06	No	Yes
Naphthalene	91-20-3	9.04E-01	3.51E+00	8.13E+00	3.36E+00	7.36E-03	2.01E-07	3.63E-01	8.1E-03	Yes	Yes
Nickel (Ni) Compounds	7440-02-0		1.28E+00		7.64E+00	5.60E-03			4.5E-03	Yes	Yes
o-Toluidine	95-53-4	3.95E+00	2.65E+00	2.81E+01	2.13E+00		1.01E-07	3.21E+00	2.0E-02	Yes	Yes
o-Xylene	1330-20-7	1.68E+01	4.57E+00		1.55E+01		8.74E-06	1.42E+00	1.9E-02	Yes	Yes
PAHs	401					3.83E-03			1.9E-06	Yes	Yes
Phenol	108-95-2	8.68E-01	3.25E+00	9.51E+00	1.32E+01		4.64E-07		1.3E-02	Yes	Yes
Propylene Oxide	75-56-9		3.10E+01	1.84E+03	2.56E+01				9.5E-01	Yes	Yes
Selenium and compounds	7782-49-2					2.43E-02			1.2E-05	Yes	Yes
Styrene	100-42-5	7.53E+01	1.28E+01		1.42E+01		3.98E-06	1.62E+00	5.2E-02	Yes	Yes
t-Butyl Methyl Ether	1634-04-4	5.76E+00					3.04E-07	5.06E-03	2.9E-03	Yes	Yes
Tetrachloroethene	127-18-4	7.26E+01	7.86E-01		1.17E+02		2.13E-07		9.5E-02	Yes	Yes
Toluene	108-88-3	3.66E+01	1.64E+02	1.10E+02	1.56E+02	3.09E-02	1.65E-05	2.99E+00	2.3E-01	Yes	Yes
Trichloroethene	79-01-6				1.63E+00		3.68E-08		8.2E-04	Yes	Yes
Vanadium (fume or dust)	7440-62-2					3.53E-04			1.8E-07	No	Yes
Xylene	1330-20-7					3.39E-02			1.7E-05	Yes	Yes
Zinc and compounds	7440-66-6					4.27E-01			2.1E-04	No	Yes
Total HAP/TAC (TPY) =									8.03	7.97	8.03
Max Individual HAP =									4.90		

Notes:
 The maximum individual HAP is carbon disulfide.
 EU-5 - Rubber Cement Glue Applicator emits no HAP or TAC.
 EU-7 - Wyatt's Tire Buffing/Painting emits no HAP or TAC.

Oregon Rubber Company						
Permit No. 206127						
Rubber Mixing & Milling						
Criteria Pollutants						
Emission Unit	2013 Usage (lbs/yr)	Max Usage (lbs/yr)	PM EF (lbs/lb rubber)	PM/PM ₁₀ /PM _{2.5} (TPY)	VOC EF (lbs/lb rubber)	VOC (TPY)
Rubber Milling and Mixing	5,902,830	17,708,490	4.0E-07	3.6E-03	3.9E-05	0.35

Federal HAPs/CAO TACs					
Pollutant	CAS/DEQ #	Mixing Cmpd #2 (lbs/lb rubber)	Mixing Cmpd #6 (lbs/lb rubber)	Max EF (lbs/lb rubber)	Total HAP (lbs/yr)
1,1,1-Trichloroethane	71-55-6	8.0E-08		8.0E-08	1.4E+00
1,4-Dichlorobenzene	106-37-6		1.2E-09	1.2E-09	2.2E-02
2-Butanone	78-93-3	1.6E-06	4.4E-07	1.6E-06	2.8E+01
2-Methylphenol	95-48-7		6.0E-09	6.0E-09	1.1E-01
4-Methyl-2-Pentanone	108-10-1	2.0E-07	3.1E-05	3.1E-05	5.4E+02
Acetophenone	98-86-2	2.1E-08	7.7E-08	7.7E-08	1.4E+00
Aniline	62-53-3	4.8E-07	1.0E-07	4.8E-07	8.5E+00
Benzene	71-43-2	4.6E-08		4.6E-08	8.2E-01
Biphenyl	92-52-4		1.2E-08	1.2E-08	2.1E-01
bis(2-Ethylhexyl)phthalate	117-81-7	3.0E-08	1.8E-07	1.8E-07	3.2E+00
Cadmium (Cd) Compounds	7440-43-9	2.4E-09	2.2E-09	2.4E-09	4.2E-02
Carbon Disulfide	75-15-0		3.8E-06	3.8E-06	6.8E+01
Carbonyl Sulfide	463-58-1		1.6E-06	1.6E-06	2.8E+01
Chloromethane	74-87-3	3.1E-08	3.3E-07	3.3E-07	5.8E+00
Chromium (Cr) Compounds	7738-94-5	7.0E-09	4.3E-09	7.0E-09	1.2E-01
Cumene	98-82-8		1.2E-08	1.2E-08	2.1E-01
Di-n-butylphthalate	84-74-2	1.6E-08	1.5E-08	1.6E-08	2.9E-01
Dibenzofuran	132-64-9	2.1E-09	3.3E-09	3.3E-09	5.9E-02
Ethylbenzene	100-41-4	1.4E-07	2.4E-07	2.4E-07	4.3E+00
Hexane	110-54-3	1.1E-06	1.5E-06	1.5E-06	2.6E+01
Isooctane	540-84-1	7.7E-07	1.6E-07	7.7E-07	1.4E+01
Isophorone	78-59-1	6.6E-07		6.6E-07	1.2E+01
Lead (Pb) Compounds	7439-92-1	3.2E-10		3.2E-10	5.7E-03
m-Xylene + p-Xylene	1330-20-7	5.8E-07	6.2E-07	6.2E-07	1.1E+01
Methylene Chloride	75-09-2	9.5E-07	2.5E-06	2.5E-06	4.4E+01
Naphthalene	91-20-3	3.3E-08	5.1E-08	5.1E-08	9.0E-01
o-Toluidine	95-53-4		2.2E-07	2.2E-07	4.0E+00
o-Xylene	95-47-6	3.9E-07	9.5E-07	9.5E-07	1.7E+01
Phenol	108-95-2	4.9E-08	4.4E-08	4.9E-08	8.7E-01
Styrene	100-42-5		4.3E-06	4.3E-06	7.5E+01
t-Butyl Methyl Ether	1634-04-4		3.3E-07	3.3E-07	5.8E+00
Tetrachloroethene	127-18-4	4.1E-06	1.0E-07	4.1E-06	7.3E+01
Toluene	108-88-3	2.1E-06	5.5E-07	2.1E-06	3.7E+01

Notes:
 EPA AP-42, Section 4.12, Mixing 30800111 emission factors were used to calculate emissions from this emission unit.
 Only mixing emission factors are used because mixing and milling are performed together with no additional heat added in the milling process.
 The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.
 PM and VOC Emission Factors are derived from EPA AP-42, Section 4.12, Mixing Tab for Compound #2.
 A 99.9% control efficiency was calculated in the PM EF for the baghouse.
 The worse-case emission factor was used for each individual HAP from EPA AP-42, Section 4.12, Mixing 30800111 for Compounds #2 and #6.
 Compound #2 = Tire Ply Coat (Natural Rubber / Synthetic Rubber) and Compound #6 = Tire Tread (Styrene Butadiene Rubber / Polybutadiene Rubber)
 EF = Emission Factor

Oregon Rubber Company						
Permit No. 206127						
Rubber Extrusion						
Criteria Pollutants						
Emission Unit	2013 Usage (lbs/yr)	Max Usage (lbs/yr)	PM EF (lbs/lb rubber)	PM/PM₁₀/PM_{2.5} (TPY)	VOC EF (lbs/lb rubber)	VOC (TPY)
Rubber Extrusion	5,902,830	17,708,490	7.8E-09	6.9E-05	1.2E-05	0.11

Federal HAPs/CAO TACs			
Chemical Name	CAS/DEQ #	Cmpd #6 (lbs/lb rubber)	Total HAP (lbs/yr)
1,1,1-Trichloroethane	71-55-6	9.37E-08	1.66E+00
1,3-Butadiene	106-99-0	5.06E-07	8.96E+00
2-Butanone	78-93-3	1.17E-07	2.07E+00
2-Chloroacetophenone	532-27-4	1.68E-09	2.98E-02
4-Methyl-2-Pentanone	108-10-1	2.66E-06	4.71E+01
Acetonitrile	75-05-8	2.19E-07	3.88E+00
Acetophenone	98-86-2	3.32E-06	5.88E+01
Acrolein	107-02-8	3.10E-07	5.49E+00
Aniline	62-53-3	2.19E-07	3.88E+00
Benzene	71-43-2	2.69E-07	4.76E+00
Biphenyl	92-52-4	1.68E-08	2.98E-01
bis(2-Ethylhexyl)phthalate	117-81-7	1.13E-07	2.01E+00
Carbon Disulfide	75-15-0	2.66E-07	4.70E+00
Chloromethane	74-87-3	6.64E-08	1.18E+00
Chromium (Cr) Compounds	7738-94-5	2.25E-08	3.99E-01
Cobalt (Co) Compounds	7440-48-4	9.92E-09	1.76E-01
Cumene	98-82-8	1.36E-07	2.40E+00
Di-n-butylphthalate	84-74-2	1.98E-07	3.51E+00
Dibenzofuran	132-64-9	3.24E-09	5.73E-02
Dimethylphthalate	131-11-3	4.27E-09	7.57E-02
Ethylbenzene	100-41-4	8.10E-08	1.43E+00
Hexane	110-54-3	3.94E-07	6.98E+00
Isooctane	540-84-1	4.51E-08	7.99E-01
m-Xylene + p-Xylene	1330-20-7	3.32E-07	5.89E+00
Methylene Chloride	75-09-2	1.32E-05	2.33E+02
Naphthalene	91-20-3	1.98E-07	3.51E+00
Nickel (Ni) Compounds	7440-02-0	7.24E-08	1.28E+00
o-Toluidine	95-53-4	1.50E-07	2.65E+00
o-Xylene	95-47-6	2.58E-07	4.57E+00
Phenol	108-95-2	1.84E-07	3.25E+00
Propylene Oxide	75-56-9	1.75E-06	3.10E+01
Styrene	100-42-5	7.25E-07	1.28E+01
Tetrachloroethene	127-18-4	4.44E-08	7.86E-01
Toluene	108-88-3	9.26E-06	1.64E+02

Notes:
 The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.
 Particulate matter emission factor data are from EPA AP-42, Section 4.12, Extrude 30800112 for Compound #6.
 HAP emission factors are from EPA AP-42, Section 4.12, Extrude 30800112 for Compound #6.
 Compound #2 = Tire Ply Coat (Natural Rubber / Synthetic Rubber) and Compound #6 = Tire Tread (Styrene Butadiene Rubber / Polybutadiene Rubber)
 EF = Emission Factor

Oregon Rubber Company				
Permit No. 206127				
Rubber Tread Press				
Criteria Pollutants				
Emission Unit	2013 Usage (lbs/yr)	Max Usage (lbs/yr)	VOC EF (lbs/lb rubber)	VOC (TPY)
Rubber Tread Press	5,902,830	17,708,490	4.0E-04	3.58

Federal HAPs/CAO TACs			
Chemical Name	CAS/DEQ #	Cmpd #2 (lbs/lb rubber)	Total HAP (lbs/yr)
1,1,1-Trichloroethane	71-55-6	2.52E-06	4.46E+01
1,3-Butadiene	106-99-0	1.20E-05	2.13E+02
1,4-Dichlorobenzene	106-46-7	7.63E-08	1.35E+00
2-Butanone	78-93-3	2.77E-06	4.90E+01
Acetophenone	98-86-2	1.39E-06	2.45E+01
Aniline	62-53-3	4.16E-07	7.37E+00
Benzene	71-43-2	1.36E-06	2.41E+01
bis(2-Ethylhexyl)phthalate	117-81-7	2.48E-06	4.39E+01
Carbon Disulfide	75-15-0	5.35E-04	9.47E+03
Carbonyl Sulfide	463-58-1	3.65E-05	6.46E+02
Cumene	98-82-8	5.90E-08	1.05E+00
Di-n-butylphthalate	84-74-2	2.11E-06	3.74E+01
Dibenzofuran	132-64-9	5.04E-08	8.92E-01
Dimethylphthalate	131-11-3	7.78E-08	1.38E+00
Hexane	110-54-3	1.03E-05	1.83E+02
m-Xylene + p-Xylene	1330-20-7	1.91E-06	3.38E+01
Methylene Chloride	75-09-2	1.57E-06	2.79E+01
Naphthalene	91-20-3	4.59E-07	8.13E+00
o-Toluidine	95-53-4	1.59E-06	2.81E+01
Phenol	108-95-2	5.37E-07	9.51E+00
Propylene Oxide	75-56-9	1.04E-04	1.84E+03
Toluene	108-88-3	6.20E-06	1.10E+02

Notes:
 The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.
 VOC emission factor data is from EPA AP42, Section 4.12, Platen Press 30800143 for Compound #2.
 HAP emission factors are from from EPA AP-42, Section 4.12, Platen Press 30800143 for Compound #2.
 Compound #2 = Tire Ply Coat
 EF = Emission Factor

Oregon Rubber Company						
Permit No. 206127						
Tread Buffing						
Criteria Pollutants						
Emission Unit	2013 Usage (lbs/yr)	Max Usage (lbs/yr)	PM EF (lbs/lb rubber)	PM/PM ₁₀ /PM _{2.5} (TPY)	VOC EF (lbs/lb rubber)	VOC (TPY)
Tread Buffing	278,940	836,820	5.5E-04	0.23	1.6E-02	6.65

Federal HAPs/CAO TACs							
Chemical Name	CAS/DEQ #	Belt 30800151 EF (lbs/lb rubber removed)	Carcass 30800152 (lbs/lb rubber removed)	Retread 30800153 (lbs/lb rubber processed)	Sidewall/White wall 30800154 (lbs/lb rubber removed)	Max EF (lbs/lb rubber removed)	Total HAP (lbs/yr)
1,1,1-Trichloroethane	71-55-6		3.58E-07	2.19E-08		3.58E-07	2.99E-01
1,3-Butadiene	106-99-0	2.41E-05	2.65E-05	4.39E-08	2.40E-05	2.65E-05	2.21E+01
1,4-Dichlorobenzene	106-46-7			6.77E-09		6.77E-09	5.66E-03
2-Butanone	78-93-3	6.22E-06	5.13E-07	1.51E-08	2.97E-05	2.97E-05	2.49E+01
2-Chloro-1,3-Butadiene	126-99-8	8.16E-05				8.16E-05	6.83E+01
2-Methylphenol	95-48-7			3.91E-09		3.91E-09	3.27E-03
4-Methyl-2-pentanone	108-10-1		1.92E-05	8.44E-07		1.92E-05	1.60E+01
4-Nitrobiphenyl	92-93-3	3.80E-07				3.80E-07	3.18E-01
Acetaldehyde	75-07-0	1.53E-05				1.53E-05	1.28E+01
Acetophenone	98-86-2	1.77E-05	7.13E-07	1.89E-08	3.37E-06	1.77E-05	1.48E+01
Acrolein	107-02-8	6.44E-06	1.68E-06	4.70E-07		6.44E-06	5.39E+00
Aniline	62-53-3		1.97E-05	6.66E-08	4.05E-04	4.05E-04	3.39E+02
Benzene	71-43-2		4.13E-06	9.96E-06	1.33E-05	1.33E-05	1.11E+01
Biphenyl	92-52-4			6.63E-09		6.63E-09	5.55E-03
bis(2-Ethylhexyl)phthalate	117-81-7	5.30E-05	7.94E-06	1.99E-08	2.76E-05	5.30E-05	4.43E+01
Cadmium (Cd) Compounds	7440-43-9	1.40E-07	8.58E-07		7.38E-07	8.58E-07	7.18E-01
Carbon Disulfide	75-15-0	3.03E-04	2.58E-06	6.77E-07	1.90E-05	3.03E-04	2.53E+02
Carbonyl Sulfide	463-58-1	7.14E-06	8.70E-06			8.70E-06	7.28E+00
Chloromethane	74-87-3			7.12E-09		7.12E-09	5.96E-03
Chromium (Cr) Compounds	7738-94-5	2.58E-06	1.44E-06	3.79E-08	1.34E-05	1.34E-05	1.12E+01
Cobalt (Co) Compounds	7440-48-4			8.74E-09		8.74E-09	7.31E-03
Cumene	98-82-8				1.13E-06	1.13E-06	9.49E-01
Di-n-butylphthalate	84-74-2	3.31E-06	2.24E-06	3.87E-08	2.54E-06	3.31E-06	2.77E+00
Dibenzofuran	132-64-9		1.59E-07			1.59E-07	1.33E-01
Ethylbenzene	100-41-4				5.70E-05	5.70E-05	4.77E+01
Hexane	110-54-3	4.18E-05	1.60E-05		1.24E-04	1.24E-04	1.03E+02
Isooctane	540-84-1	0.00E+00	1.09E-05		1.15E-04	1.15E-04	9.60E+01
Isophorone	78-59-1			6.46E-09		6.46E-09	5.40E-03
Lead (Pb) Compounds	7439-92-1	1.59E-06	2.02E-06		1.55E-05	1.55E-05	1.30E+01
m-Xylene + p-Xylene	1330-20-7	8.51E-06	2.23E-06	5.36E-08	3.18E-05	3.18E-05	2.66E+01
Methylene Chloride	75-09-2	4.98E-05	2.50E-07	1.67E-07	2.76E-05	4.98E-05	4.16E+01
Naphthalene	91-20-3	4.02E-06	5.81E-07	2.11E-08	3.81E-06	4.02E-06	3.36E+00
Nickel (Ni) Compounds	7440-02-0	9.13E-06	2.03E-06	1.78E-08	7.51E-06	9.13E-06	7.64E+00
o-Toluidine	95-53-4		2.55E-06			2.55E-06	2.13E+00
o-Xylene	95-47-6	5.40E-06		4.17E-08	1.86E-05	1.86E-05	1.55E+01
Phenol	108-95-2	8.88E-06	1.66E-06	3.04E-07	1.57E-05	1.57E-05	1.32E+01
Propylene Oxide	75-56-9	3.06E-05				3.06E-05	2.56E+01
Styrene	100-42-5			9.86E-08	1.69E-05	1.69E-05	1.42E+01
Tetrachloroethene	127-18-4	1.39E-04		7.58E-09		1.39E-04	1.17E+02
Toluene	108-88-3	6.30E-06	6.30E-06	3.82E-07	1.86E-04	1.86E-04	1.56E+02
Trichloroethene	79-01-6		1.95E-06			1.95E-06	1.63E+00

Notes:

The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.
 Sidewall, carcass, and belt grinding are reported in pounds emitted per pound of rubber removed or ground-off.
 Retread buffing is reported in pounds emitted per pound of rubber processed.
 The particulate matter control devices are assumed to achieve a removal efficiency of 99.9%.
 PM, VOC and HAP emission factors are from EPA AP-42, Section 4.12, Grinding tab .
 The particulate matter emission factor is based on the worst-case emission factor of Belt, Carcass, Retread, or Sidewall/Whitewall.
 The VOC emission factor is based on the worst-case emission factor of Belt, Carcass, Retread, or Sidewall/Whitewall.
 EF = Emission Factor

Oregon Rubber Company					
Permit No. 206127					
Rubber Cement Glue Applicator					
Criteria Pollutants					
Emission Unit	2013 Usage (gal/yr)	Coating Density (lbs/gal)	Max Usage (lbs/yr)	Coating VOC Content	VOC (TPY)
Rubber Cement Glue Applicator	3,805	8.06	92,005	85%	39.1
Notes:					
The facility uses Remabond Brush Cement manufactured by Rema Tip Top for tire repair & retraining purposes.					
The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.					
Density and VOC percentage are based on manufacturer's safety data sheet.					

Oregon Rubber Company						
Permit No. 206127						
Tire Buffing						
Criteria Pollutants						
Emission Unit	2022 Usage (tires/yr)	Max Usage (tires/yr)	PM EF (lbs/tire)	PM/PM₁₀/PM_{2.5} (TPY)	VOC EF (lbs/tire)	VOC (TPY)
Tire Buffing	15,302	45,906	1.3E-02	0.30	3.2E-03	0.07
Notes:						
The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.						
Using GCR/Bridgestone Coburg, OR application (2009 Modification) as a reference, according to the 1987 Goodyear study, 13 lbs of tire buffings/tire is used in Tire Curing.						
The particulate matter control devices are assumed to achieve a removal efficiency of 99.9%.						
Tire painting is considered an insignificant activity at this facility.						
The PM emission factor is calculated as Tire Buffing = 13 * (1-0.999) = 1.3E-02 lbs/tire.						
Using GCR/Bridgestone Coburg, OR application (2009 Modification) as a reference, the VOC Emission Factor is from EPA AP-42, Section 4.12, Tire Grinding - Retread.						
The VOC emission factor is calculated as 2.43E-04 lbs/lb rubber * 13 lbs tire buffings/tire = 3.16E-03 lbs VOC/tire.						
EF = Emission Factor						

Oregon Rubber Company				
Permit No. 206127				
Tire Curing				
Criteria Pollutants				
Emission Unit	2022 Usage (tires/yr)	Max Usage (tires/yr)	VOC Emission Factor (lb/tire)	VOC (TPY)
Wyatt's Tire Curing	15,302	45,906	4.0E-03	0.09

Federal HAPs/CAO TACs							
Chemical Name	CAS/DEQ #	OEM 205/70 (lbs/lb rubber)	High Perform. 205/70 (lbs/lb rubber)	OEM 195/75 (lbs/lb rubber)	Replacement 195/75 (lbs/lb rubber)	Max EF (lbs/lb rubber)	Total HAP (lbs/yr)
Total VOC		1.80E-04	2.11E-04	3.10E-04	1.94E-04	3.10E-04	1.85E+02
Total HAPs		8.59E-05	1.06E-04	8.53E-05	5.43E-05	1.06E-04	6.33E+01
1,1,1-Trichloroethane	71-55-6	1.19E-07	2.41E-07	3.96E-08	9.27E-08	2.41E-07	1.44E-01
1,1,2,2-Tetrachloroethane	79-34-5			1.03E-07		1.03E-07	6.15E-02
1,1-Dichloroethane	75-34-3	7.96E-08				7.96E-08	4.75E-02
1,1-Dichloroethene	75-35-4	5.85E-07				5.85E-07	3.49E-01
1,2,4-Trichlorobenzene	120-82-1				2.59E-09	2.59E-09	1.55E-03
1,2-Dibromo-3-Chlorobenzene	96-12-8			2.06E-07		2.06E-07	1.23E-01
1,4-Dichlorobenzene	106-46-7	6.79E-07	1.89E-09	2.49E-09	6.80E-09	6.79E-07	4.05E-01
2-Butanone	78-93-3	1.55E-06	1.10E-06	6.35E-07	5.37E-07	1.55E-06	9.22E-01
2-Chloroacetophenone	532-27-4		1.28E-09			1.28E-09	7.64E-04
2-Methylphenol	95-48-7		9.00E-09	5.42E-09	6.63E-09	9.00E-09	5.37E-03
4-Methyl-2-Pentanone	108-10-1	9.60E-06	1.29E-05	1.32E-05	1.26E-05	1.32E-05	7.88E+00
Acetophenone	98-86-2	1.08E-07	1.07E-07	1.04E-07	1.20E-07	1.20E-07	7.16E-02
Acrolein	107-02-8				1.28E-07	1.28E-07	7.64E-02
Aniline	62-53-3	4.36E-06	5.29E-07	3.73E-06	3.57E-06	4.36E-06	2.60E+00
Benzene	71-43-2	3.51E-07	4.78E-07	2.01E-07	2.41E-07	4.78E-07	2.85E-01
Benzyl Chloride	100-44-7	4.42E-08				4.42E-08	2.64E-02
Biphenyl	92-52-4		5.41E-08	6.78E-08	3.97E-08	6.78E-08	4.05E-02
bis(2-Ethylhexyl)phthalate	117-81-7		7.00E-09	6.89E-08	5.92E-07	5.92E-07	3.53E-01
Bromomethane	74-83-9			9.15E-08		9.15E-08	5.46E-02
Carbon Disulfide	75-15-0	4.92E-07	6.86E-06	1.32E-05	4.60E-06	1.32E-05	7.88E+00
Carbonyl Sulfide	463-58-1			5.44E-07		5.44E-07	3.25E-01
Chloroform	67-66-3		2.17E-08			2.17E-08	1.30E-02
Chloromethane	74-87-3	4.92E-08	6.49E-08	9.25E-08	4.70E-08	9.25E-08	5.52E-02
Cumene	98-82-8		4.75E-07	2.28E-07	1.36E-07	4.75E-07	2.83E-01
Di-n-butylphthalate	84-74-2	9.49E-07	2.88E-07	1.97E-07	4.52E-07	9.49E-07	5.66E-01
Dibenzofuran	132-64-9		5.84E-09	9.11E-09	9.81E-09	9.81E-09	5.85E-03
Dimethylphthalate	131-11-3	4.06E-09	9.60E-08	7.36E-09	2.09E-08	9.60E-08	5.73E-02
Ethylbenzene	100-41-4	1.03E-05	1.35E-05	8.55E-06	3.70E-06	1.35E-05	8.06E+00
Hexane	110-54-3	3.04E-06	5.97E-06	6.62E-07	1.58E-06	5.97E-06	3.56E+00
Isophorone	78-59-1	4.37E-09	2.06E-08	4.54E-09	7.62E-09	2.06E-08	1.23E-02
m-Xylene + p-Xylene	1330-20-7	2.34E-05	3.36E-05	2.27E-05	1.26E-05	3.36E-05	2.01E+01
Methylene Chloride	75-09-2	5.62E-06	2.87E-06	4.21E-06	2.18E-06	5.62E-06	3.35E+00
Naphthalene	91-20-3		2.01E-07	1.76E-07	1.24E-07	2.01E-07	1.20E-01
o-Toluidine	95-53-4	7.21E-09	5.45E-08	9.12E-08	1.01E-07	1.01E-07	6.03E-02
o-Xylene	95-47-6	7.73E-06	8.74E-06	6.09E-06	3.06E-06	8.74E-06	5.22E+00
Phenol	108-95-2	1.30E-07	4.64E-07	3.89E-08	3.87E-07	4.64E-07	2.77E-01
Styrene	100-42-5	3.98E-06	6.83E-07	3.39E-07	4.71E-07	3.98E-06	2.37E+00
t-Butyl Methyl Ether	1634-04-4	3.04E-07				3.04E-07	1.82E-01
Tetrachloroethene	127-18-4	2.13E-07	9.56E-08	3.83E-08		2.13E-07	1.27E-01
Toluene	108-88-3	1.22E-05	1.65E-05	9.47E-06	6.88E-06	1.65E-05	9.85E+00
Trichloroethene	79-01-6				3.68E-08	3.68E-08	2.20E-02

Notes:
 The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.
 VOC and HAP emission factors are from EPA AP-42, Section 4.12, Tire Cure tab.
 VOC and HAP emission factors are based on worst case emission factor from the four materials.
 Using GCR/Bridgestone Coburg, OR application (2009 Modification) as a reference, according to the 1987 Goodyear study, 13 lbs of tire buffings/tire is used in Tire Curing.
 The VOC emission factor is calculated as 0.00031 lbs/lb rubber * 13 lbs of tire buffings/tire = 4.03E-03 lbs of VOC emitted per tire buffing.
 EF = Emission Factor

Oregon Rubber Company				
Permit No. 206127				
Tire Autoclave				
Criteria Pollutants				
Emission Unit	2022 Usage (tires)	Max Usage (tires)	VOC EF (lbs/tire)	VOC (TPY)
Wyatt's Tire Autoclave	15,302	45,906	1.7E-03	0.04
Federal HAPs/CAO TACs				
Pollutant	CAS/DEQ #	Cmpd #6 (lbs/lb rubber)	Total HAP (lbs/yr)	
Total VOC		1.29E-04	7.72E+01	
Total HAPs		6.73E-05	4.02E+01	
1,3-Butadiene	106-99-0	5.33E-07	3.18E-01	
1,4-Dichlorobenzene	106-46-7	6.86E-09	4.10E-03	
2-Butanone	78-93-3	3.48E-08	2.08E-02	
4-Methyl-2-Pentanone	108-10-1	1.35E-05	8.09E+00	
Acetophenone	98-86-2	6.08E-06	3.63E+00	
Aniline	62-53-3	7.35E-06	4.39E+00	
Benzene	71-43-2	8.59E-06	5.12E+00	
Biphenyl	92-52-4	2.64E-07	1.58E-01	
bis(2-Ethylhexyl)phthalate	117-81-7	9.68E-07	5.78E-01	
Carbon Disulfide	75-15-0	5.51E-07	3.29E-01	
Carbonyl Sulfide	463-58-1	8.08E-07	4.82E-01	
Chloromethane	74-87-3	6.79E-08	4.05E-02	
Cumene	98-82-8	7.93E-07	4.73E-01	
Di-n-butylphthalate	84-74-2	2.12E-08	1.26E-02	
Dibenzofuran	132-64-9	1.02E-08	6.08E-03	
Ethylbenzene	100-41-4	2.24E-06	1.34E+00	
Hexane	110-54-3	7.85E-07	4.68E-01	
Isooctane	540-84-1	2.00E-07	1.19E-01	
m-Xylene + p-Xylene	1330-20-7	6.88E-06	4.10E+00	
Methylene Chloride	75-09-2	1.50E-06	8.94E-01	
Naphthalene	91-20-3	6.08E-07	3.63E-01	
o-Toluidine	95-53-4	5.37E-06	3.21E+00	
o-Xylene	95-47-6	2.38E-06	1.42E+00	
Styrene	100-42-5	2.72E-06	1.62E+00	
t-Butyl Methyl Ether	1634-04-4	8.48E-09	5.06E-03	
Toluene	108-88-3	5.01E-06	2.99E+00	
Notes:				
The maximum usage is based on the highest annual actual usage between 2013-2023 scaled up to 3 shifts per day.				
VOC and HAP emission factors are from EPA AP-42, Section 4.12, Autoclave tab.				
The autoclave device is fully electric without contact steam.				
Using GCR/Bridgestone Coburg, OR application (2009 Modification) as a reference, according to the 1987 Goodyear study, 13 lbs of tire buffings/tire is used in Tire Curing				
The VOC Emission Factor is calculated as 0.000129 lbs/lb rubber * 13 lbs tire buffings per tire = 1.68E-03 lbs VOC emitted/tire				
EF = Emission Factor				

Oregon Rubber Company					
Permit No. 206127					
Boiler					
Boiler Specifications					
Max Heat Input	1.725	MMBtu/hr			
Heat Value - Natural Gas	1026	MMBtu/MMscf			
Max Hrs Operation	8760	hr/yr			
Criteria Pollutants					
Pollutant	Emission Factor	Units	PTE (TPY)		
PM/PM ₁₀ /PM _{2.5}	2.5	lbs/MMCF	1.8E-02		
Carbon Monoxide	84	lbs/MMCF	0.62		
Nitrogen Oxides	100	lbs/MMCF	0.74		
Sulfur Dioxide	1.7	lbs/MMCF	1.3E-02		
VOCs	5.5	lbs/MMCF	4.1E-02		
GHGs (CO ₂ equiv.)	117	lbs/MMBTU	885		
Federal HAPs/CAO TACs					
Pollutant	CAS/DEQ #	EF (lbs/MMscf)	Total HAP (lbs/yr)	Federal HAP	CAO Air Toxic
Acetaldehyde	75-07-0	0.0031	4.6E-02	Yes	Yes
Acrolein	107-02-8	0.0027	4.0E-02	Yes	Yes
Benzene	71-43-2	0.0058	8.5E-02	Yes	Yes
Benzo[a]pyrene	50-32-8	0.000012	1.8E-05	Yes	Yes
Ethyl Benzene	100-41-4	0.0069	1.0E-01	Yes	Yes
Formaldehyde	50-00-0	0.0123	1.8E-01	Yes	Yes
Hexane	110-54-3	0.0046	6.8E-02	Yes	Yes
Naphthalene	91-20-3	0.0003	4.4E-03	Yes	Yes
PAHs	401	0.0001	1.5E-03	Yes	Yes
Toluene	108-88-3	0.0265	3.9E-01	Yes	Yes
Xylenes	1330-20-7	0.0197	2.9E-01	Yes	Yes
Ammonia	7664-41-7	3.2000	4.7E+01	No	Yes
Arsenic and compounds	7440-38-2	0.0002	2.9E-03	Yes	Yes
Barium and compounds	7440-39-3	0.0044	6.5E-02	No	Yes
Beryllium and compounds	7440-41-7	0.000012	1.8E-04	Yes	Yes
Cadmium and compounds	7440-43-9	0.0011	1.6E-02	Yes	Yes
Chromium VI, chromate/dichro	18540-29-9	0.0014	2.1E-02	Yes	Yes
Cobalt and compounds	7440-48-4	0.000084	1.2E-03	Yes	Yes
Copper and compounds	7440-50-8	0.00085	1.3E-02	No	Yes
Lead and compounds	7439-92-1	0.0005	7.4E-03	Yes	Yes
Manganese and compounds	7439-96-5	0.00038	5.6E-03	Yes	Yes
Mercury and compounds	7439-97-6	0.00026	3.8E-03	Yes	Yes
Molybdenum trioxide	1313-27-5	0.00165	2.4E-02	No	Yes
Nickel compounds, insoluble	365	0.0021	3.1E-02	Yes	Yes
Selenium and compounds	7782-49-2	0.000024	3.5E-04	Yes	Yes
Vanadium (fume or dust)	7440-62-2	0.0023	3.4E-02	No	Yes
Zinc and compounds	7440-66-6	0.029	4.3E-01	No	Yes
GHG-Related Emission Factors					
Pollutant	(kg/MMBtu)	GWP			
Carbon Dioxide (CO ₂)	53.06	1			
Methane (CH ₄)	1.0E-03	25			
Nitrous Oxide (N ₂ O)	1.0E-04	298			
Notes:					
Criteria pollutant emissions factors are from DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011).					
GHG emission factors and boiler natural gas high heat value (MMBtu/MMscf) are from 40 CFR 98, Tables C-1 and C-2.					
HAP and CAO TAC emission factors are based on the Oregon DEQ 2020 ATEI Combustion EF Tool.					
EF = Emission Factor					